

1 L. KIERAN KIECKHEFER, SBN 251978  
kkieckhefer@gibsondunn.com  
2 JOSEPH A. GORMAN, SBN 267553  
jgorman@gibsondunn.com  
3 CHRISTINA MYROLD, SBN 324183  
cmyrold@gibsondunn.com  
4 GIBSON, DUNN & CRUTCHER LLP  
One Embarcadero Center, Suite 2600  
5 San Francisco, California 94111-3715  
Telephone: 415.393.8200  
6 Facsimile: 415.393.8306

7 ILISSA SAMPLIN, SBN 314018  
isamplin@gibsondunn.com  
8 GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
9 Los Angeles, California 90071-3197  
Telephone: 213.229.7000  
10 Facsimile: 213.229.7520

11 AHMED ELDESSOUKI, *admitted pro hac vice*  
aeldessouki@gibsondunn.com  
12 GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
13 New York, New York 10166-0193  
Telephone: 212.351.4000  
14 Facsimile: 212.351.4035

15 *Attorneys for Plaintiff Cadence Design  
Systems, Inc.*

16  
17 **UNITED STATES DISTRICT COURT**  
18  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20  
21 **SAN JOSE DIVISION**

20 CADENCE DESIGN SYSTEMS, INC., a  
21 Delaware corporation,

22 Plaintiff,

23 v.

24 JEFFREY APPLEBAUM,

25 Defendant.  
26  
27  
28

JOEL P. WAETLY, SBN 226728  
joel@waeltylaw.com  
LAW OFFICES OF JOEL P. WAELTY  
101 Cooper Street, Suite 209  
Santa Cruz, California 95060  
Telephone: 408.752.2003  
Facsimile: 408.290.8892

*Attorney for Defendant Jeffrey Applebaum*

CASE NO. 5:24-cv-00290-PCP

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
VOLUNTARY DISMISSAL OF  
PLAINTIFF'S CLAIMS AGAINST  
DEFENDANT**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Civil Local Rule 7-12, Plaintiff Cadence Design Systems, Inc. ("Plaintiff") and Defendant Jeffrey Applebaum ("Defendant"), by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, on January 16, 2024, Plaintiff filed its Complaint in the above-captioned action against Defendant;

WHEREAS, on February 8, 2024, Defendant filed his Answer to the Complaint;

WHEREAS, the parties have settled all claims in this action pursuant to a confidential settlement agreement;

WHEREAS, the parties have met and conferred and agree that the above-captioned action should be dismissed with prejudice, with each party to bear their own attorneys' fees and costs incurred in connection with this action;

WHEREAS, the parties also agree that the Case Management Conference, currently set for August 22, 2024, should be taken off calendar;

WHEREFORE, the parties hereby request that the Court enter the Proposed Order submitted concurrently herewith granting the parties' request and directing the clerk of court to dismiss the above-captioned action with prejudice.

**IT IS SO STIPULATED.**

DATED: June 11, 2024

Respectfully submitted,

By: /s/ L. Kieran Kieckhefer  
**GIBSON, DUNN & CRUTCHER**  
L. Kieran Kieckhefer  
Ilissa Samplin  
Joseph A. Gorman  
Ahmed ElDessouki  
Christina E. Myrold

*Attorneys for Plaintiff Cadence Design Systems, Inc.*

By: /s/ Joel P. Waelty  
**LAW OFFICES OF JOEL P. WAELTY**  
Joel P. Waelty

*Attorney for Defendant Jeffrey Applebaum*

**[PROPOSED] ORDER**

Having received and considered the Joint Stipulation submitted by the parties, and good cause appearing, the Court hereby approves and GRANTS the stipulation. As a result, the Court HEREBY ORDERS:

1. The clerk shall enter the parties' stipulated dismissal with prejudice and close the above-captioned action;

2. The Case Management Conference, currently set for August 22, 2024, shall be taken off calendar; and

3. Plaintiff and Defendant shall bear their own attorneys' fees and costs.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
The Honorable P. Casey Pitts  
UNITED STATES DISTRICT COURT JUDGE

**ECF ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: June 11, 2024

By: /s/ L. Kieran Kieckhefer  
L. Kieran Kieckhefer